

REMARKS

Claims 1, 4, 7-11, 14, 16-18, and 20-25 are now pending in the application. Claims 1, 11, 18, and 21 are amended with this paper. Claim 21 is being amended to make a correction and not to distinguish over the Examiner's cited art. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 1, 4, 7-11, 14, 16-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,195,045 ("Keane") in view of U.S. Patent No. 6,131,125 ("Rostoker"). Claims 18-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Keane in view of U.S. Patent No. 6,269,252 ("Hutchings").

Applicant has amended independent Claims 1, 11, and 18 to clarify that the mass storage device is removable. Applicant respectfully avers that Keane, Rostoker, and Hutchings, individually or in combination, do not disclose the applicant's removable mass storage device and therefore amended Claims 1, 11, and 18 are non-obvious in light of the cited references.

Claims 21-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,359,250 ("Blonigan") in view of U.S. Patent No. 6,269,252 ("Hutchings").

Applicants respectfully submit that there is no motivation to combine Blonigan and Hutchings. Blonigan at best describes a plasma enhanced chemical vapor deposition (PECVD) system that includes an RF power supply system (50) and a

manometer (63) that generates a pressure signal. It is important to note that Blonigan does not disclose an interface for providing the PECVD system with communications capability. Blonigan also does not provide any motivation for the PECVD system to communicate with another device.

Hutchings at best describes a network bridge for connecting one or more computer networks with a user (col. 2, lines 45-55), where the networks can use different protocols and modulation modes.

The Examiner indicated that the motivation to combine Hutchings and Blonigan would be to "provide for the purpose of connecting two or more communications networks together to enable communication between the networks". This motivation is peculiar since it is completely solved by Hutchings alone, and it must be since Blonigan does not express any reason or capability to communicate with anything. The applicant therefore believes avers that the Examiner is using impermissible hindsight reconstruction to reject the Claims. The Examiner has used the present application as a blueprint, selected Blonigan as the prior art power delivery system component and sensor, and then searched other prior art for the missing elements without identifying or discussing any specific evidence of motivation to combine other than providing conclusory statements regarding the knowledge in the art, motivation and obviousness. The Federal Circuit has noted that the PTO and the courts "cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention," In re Fine, 837 F.2d 1071, 1075, 5 USPQ2d 1780, 1783 (Fed. Cir. 1988), and that the best defense against hindsight-based obviousness analysis is the rigorous application of the requirement for a showing of a teaching or

motivation to combine the prior art references. Combining prior art references without evidence of such a suggestion, teaching, or motivation simply takes the inventor's disclosure as a blueprint for piecing together the prior art to defeat patentability--the essence of hindsight. Dembiczak, 50 USPQ2d at 1617.

In addition to the motivation to combine issue, the applicant respectfully avers that the combination of Hutchings and Blonigan does not provide all of the elements of Claim 21. In particular, Claim 21 requires that each one of the portable devices can connect between the POD interface and only one of the plurality of types of interfaces and is adapted to translate between the first protocol and only one of the plurality of protocols. The Examiner relied on the Hutchings to provide these elements, however Hutchings does not provide identical elements. Instead, the network bridge of Hutchins is capable of translating between a protocol of the user interface (53) and a plurality of protocols that are used by the various networks (52A-52N). For this reason, the applicant respectfully avers that the combination of Hutchings and Blonigan does not provide all of the requisite elements of claim 21.

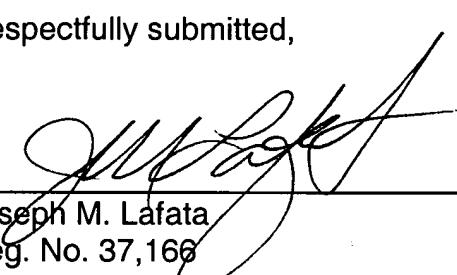
Claims 22-25 depend from claim 21 and are also believed to be in a condition for allowance for the above reasons.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: November 3, 2005

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